

ORIGINAL

[Signature]
BY _____

AIND
ADAM PAUL LAXALT
Attorney General
MICHAEL C. KOVAC
Deputy Attorney General
Nevada Bar No. 11177
Office of the Attorney General
Insurance Fraud Control Unit
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101-1068
P: (702) 486-0622
F: (702) 486-2377
MKovac@ag.nv.gov
Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, STATE OF NEVADA

STATE OF NEVADA,

Plaintiff,

v.

CHAD GARY KRUGER, ID#2694716,

Defendant(s).

Case No.: C-13-291557-2

Dept. No.: XII

AMENDED INDICTMENT

Defendant CHAD GARY KRUGER is accused by the Grand Jury of Clark County, Nevada, of INSURANCE FRAUD (a category D felony – NRS 686A.2815(3) and 686A.291) within Clark County, Nevada, as follows:

COUNT ONE

INSURANCE FRAUD

(Category D Felony – NRS 686A.2815(3) and 686A.291)

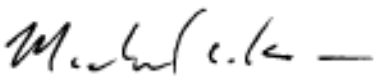
Defendant CHAD GARY KRUGER and coconspirators Steven Martin Shaw and Chad Gary Kruger, on or about October 25, 2012, within Clark County, Nevada, did knowingly and willfully, present or assist, abet, solicit, or conspire with another person to present, or caused to be presented, to an insurer false or misleading information concerning a material fact in

1 support of a claim for benefits made under a policy of insurance issued pursuant to the
2 Nevada Insurance Code, to wit: Defendant KRUGER and his coconspirators did conspire to
3 conceal a Suzuki motorcycle belonging to coconspirator Hughes so that Hughes could report
4 the motorcycle as stolen to Progressive Insurance and obtain an insurance payment for the
5 value of the vehicle.

6 All of which is contrary to the form, force, and effect of the statutes in such cases made
7 and provided, and against the peace and dignity of the State of Nevada.

8 DATED this 28th day of August, 2015.

9 ADAM PAUL LAXALT
10 Attorney General

11 By: 
12 MICHAEL C. KOVAC, ESQ.
13 Deputy Attorney General
14 Nevada Bar No. 11177

15 ENDORSEMENT: A True Bill

16 By: _____
17 Foreperson, Clark County Grand Jury
18 GJ#
19
20
21
22
23
24
25
26
27
28